

# APPENDIX P6

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## Environmental Justice & Title VI Analysis: Environmental Justice Report



## P6 Environmental Justice Report

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This section summarizes the results of the Environmental Justice analysis, which is called out separately to satisfy federal requirements in the regional planning process. For more information on the policy framework underlying this report, see Appendix P1. For more information about methodology, see Appendix P2.

### Environmental Justice Analysis and Results

Under Executive Order 12898 and the associated DOT Order on Environmental Justice, SJCOG must assist DOT, FTA and the Federal Highway Administration (FHWA) in their mission “to avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects” on environmental justice (EJ) populations. For this analysis, adverse effects are determined using the results from the three land use performance measures, described in Appendix P2 and discussed in Appendix P4. SJCOG defines EJ communities in Appendix P2 as census tracts in San Joaquin County meeting one or both concentration thresholds for minority population (<80%) or population living below 150% of the federal poverty threshold (40%+). The analysis must determine if EJ communities share in the benefits of the Draft Plan’s investments without bearing a disproportionate share of burdens.

As noted in Appendix P2, to make this determination, this report uses the DOT definition of a “disproportionately high and adverse effect,” which relies on meeting the following two conditions:

- An adverse impact is predominately borne by minority and/or low-income populations, and
- An adverse impact on minority and/or low-income populations is significantly more severe or greater in magnitude than the

adverse effect on non-minority and/or non-low-income populations.

The following discussion includes a duplication of results from an analysis of land use performance measures from Appendix P4. The results provide the basis for demonstrating compliance with federal requirements for the Environmental Justice Executive Order 12898.

### Analysis of Land Use Performance Measures

To conduct the analysis of benefits and burdens on disadvantaged communities, SJCOG identified three land use performance measures, which are a subset of performance measures for the Draft Plan. The performance measures examined in this section include indicators that impact transit accessibility, air pollution exposure, and housing choice. Using SJCOG’s Envision Tomorrow land use model, the performance measures are projected from the base year of 2016 to 2035 and controlled to 2046 numbers to compare the impact of the 2018 Plan alternative and the Draft Plan.

Table P6-1 summarizes the modeled results for each of the land use performance measures, which was applied to EJ and non-EJ communities of San Joaquin County.

**Table P6-1. Summary of Results for Land Use Performance Measures<sup>1</sup>**

<b>Performance Measure</b>	<b>Sub-Geography</b>	<b>Base Year<sup>2</sup></b>	<b>2018 Plan<sup>3</sup></b>	<b>Draft Plan<sup>3</sup></b>
Percent (and number) of <i>total</i> households / employment located within ½ mile of high quality transit stops and centers	EJ Communities	18.9% / 29.9% (12,822 / 26,683)	19% / 25.6% (15,813 / 30,461)	23.9% / 30.1% (20,965 / 36,591)
	Non-EJ Communities	4.6% / 12.9% (7,333 / 19,327)	4.1% / 10.9% (9,011 / 21,064)	4.2% / 11.1% (9,032 / 21,161)
Percent (and number) of <i>total</i> households within 500 feet of freeway	EJ Areas	5.3% (3,557)	5.3% (4,423)	6.1% (5,354)
	Non-EJ Communities	5.4% (8,613)	5.6% (12,300)	5.7% (12,384)
Percent (and number) of <i>total</i> Housing Mix by Single Family / Multifamily Units	EJ Areas	69% / 31% (49,324 / 22,183)	66% / 34% (57,691 / 30,203)	60% / 40% (55,104 / 37,171)
	Non-EJ Communities	81% / 19% (137,256 / 31,856)	76% / 24% (176,531 / 55,689)	74% / 26% (169,457 / 58,442)

<sup>1</sup> Results projected to year 2035 and controlled to 2046 numbers

<sup>2</sup> Base year is 2016

<sup>3</sup> Year 2046 projections

In Table P6-2, SJCOG summarizes its analysis of the results from Table P6-1 to show whether there are

any “disproportionately high and adverse effects” resulting from the Draft Plan on EJ communities.

**Table P6-2. Summary of Environmental Justice Analysis Results for the Draft Plan**

Performance Measure	Does the Draft Plan have an adverse effect on EJ communities?*	Is the adverse effect disproportionately high? **
	<i>Draft Plan versus 2018 Plan Alternative for EJ communities (see Table P4-1)</i>	<i>EJ communities vs. Non-EJ communities (see Table P4-1)</i>
1. Percent of total households / employment located within ½ mile of high quality transit stops and centers	No	No
2. Percent of households within 500 feet of freeway	No	No
3. Percent of total housing mix by single-family / multifamily	No	No

\*Compares the analysis results for the 2018 Plan Alternative and the Draft Plan to determine whether the measure is moving in the right direction for EJ populations.

\*\*Compares the analysis results for the Draft Plan relative to EJ and non-EJ communities. An EJ community is determined to experience “disproportionately high adverse effect” when the Draft Plan has an adverse effect on EJ communities AND when the adverse impact from the Draft Plan is greater than the adverse impact of the No Build Alternative.

Using the results summarized in Table P4-1, the environmental justice analysis determined no adverse effects on EJ communities when comparing the impact of the 2022 Plan alternative and the Draft Plan.

In the case of percent total households / employment located within ½ mile of high-quality transit stops and centers, EJ communities would experience a higher benefit under the Draft Plan compared to the 2018 Plan alternative (see Table P4-1) with 23.9% of all households and 30.1% of all employment within ½ mile of high-quality transit stops versus 19% and 25.6 percent) for the 2018 Plan. With the Draft Plan, EJ communities would have a much higher percentage of households and employment within ½ mile of high-quality transit than non-EJ communities (4.2% and 11.1%).

The Draft Plan will have a higher percent (6.1%) of households within 500 feet of a freeway than the

2018 Plan (5.3%) in EJ Communities. The Draft Plan will also have a higher percent in EJ communities than in non-EJ communities (6.1% versus 5.7%). These are the result of the Draft Plan having much higher percentages of infill and redevelopment acres than the 2018 Plan. Infill and redevelopment acres tend to be located within or near the urban core where there is a higher density of freeways. Because the differences are minimal, SJCOG determined that this did not rise to the level of “significantly more severe” or “greater in magnitude”.

For housing mix, the Draft Plan will provide more housing choice in EJ communities than the 2018 Plan alternative. The Draft Plan will result in housing mix of 60% single-family and 40% multifamily while the 2018 Plan will have a housing mix of 66% and 34%.

With the Draft Plan, EJ communities will have more housing choice than in non-EJ communities (60%/40% versus 74%/26%).